

JAN 27, 1988 MEETING HANDOUTS (ORIGINALS)



SEMS DocID

654107

AGENDA

CIBA-GEIGY PUBLIC MEETING

1-27-88

I. RCRA Facility Assessment (RFA) Study

- ° Purpose
- ° Components of RFA
- ° Sample Locations and Media Sampled
- ° Types of Analyses
- ° Results and Findings
- ° Recommendations

II. What Happens Next - RCRA Facility Investigation (RFI)

- ° Purpose
- ° RCRA Authority - 3008(h) Enforcement Order
- ° Structure of Order
- ° EPA Oversight

III. Public Participation

- ° Public Meetings
- ° Public Notice
- ° Public Comment Period

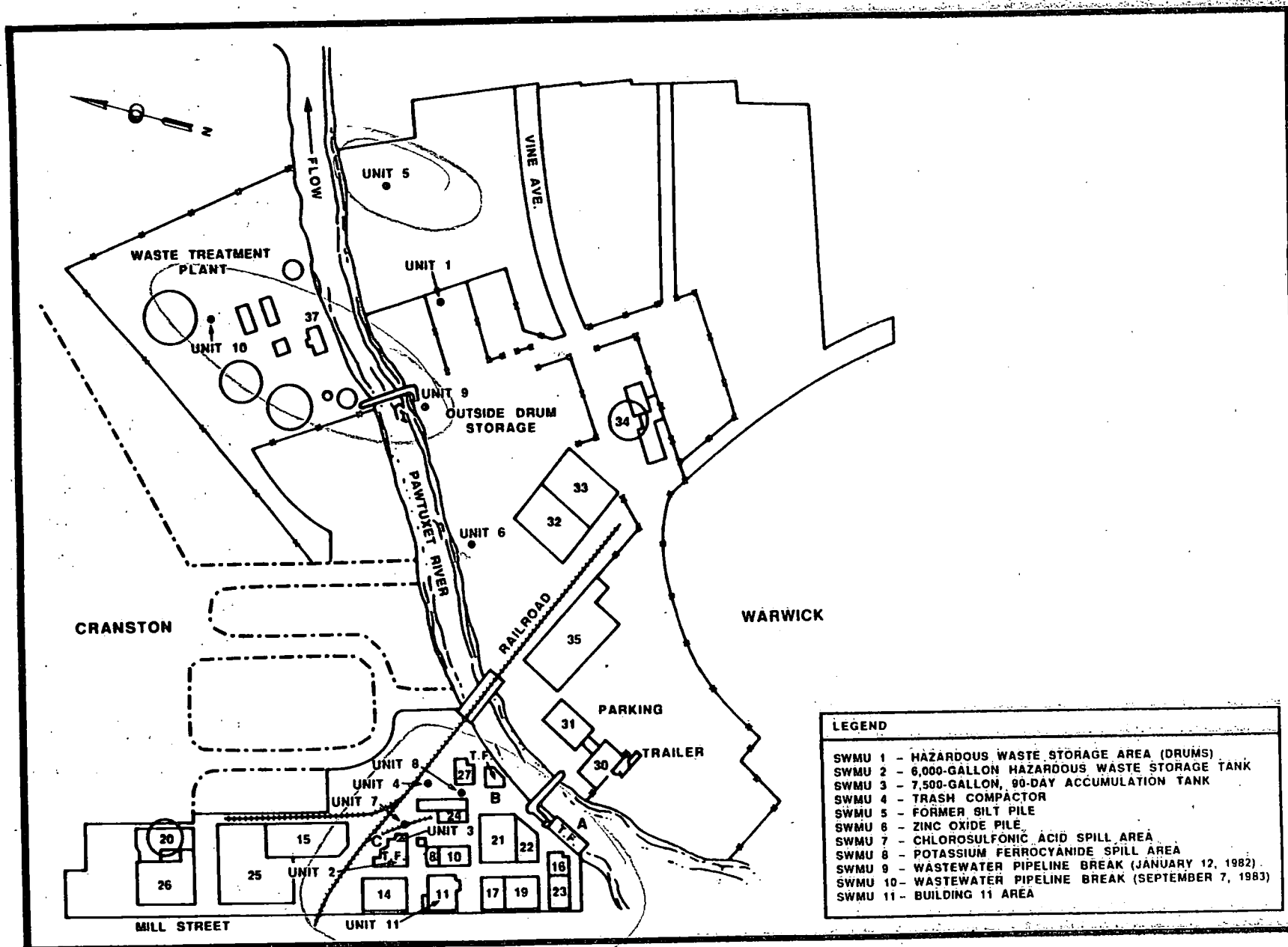


FIGURE 3. LOCATIONS OF SOLID WASTE MANAGEMENT UNITS, CIBA-GEIGY CORPORATION, CRANSTON, RHODE ISLAND (CIBA-GEIGY, 1985)

**EPA
Briefing Notes
City of Cranston/State Task Force
Ciba Geigy
1-27-88**

- 1. Objectives and Scope of the Resource Conservation and Recovery Act (RCRA) Corrective Action Program**
- 2. Corrective Action Process**
- 3. Current Corrective Action Status of Ciba Geigy**
- 4. Future Activities**
- 5. EPA Contact:**

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1. Objectives and Scope of RCRA Corrective Action

Primary objective is to clean up releases of hazardous waste and hazardous waste constituents that threaten human health and the environment.

Applies to all operating, closed or closing RCRA facilities.

New RCRA authorities - initiated in 1984.

\$3004(u) - Corrective Action for Continuing Releases

Requires that any permit issued after November 8, 1984, require corrective action for all releases from solid waste management units (SWMU) at the facility. The provision also requires that owner/operator demonstrate financial assurance for any required corrective action and allows schedules of compliance to be used in permits where the corrective action cannot be completed prior to permit issuance.

\$3008(h) - Interim Status Corrective Action Orders

Provides authority to issue enforcement orders to compel corrective action or other response measures at interim status facilities, and to take civil action against facilities for appropriate relief.

\$3004(v) - Corrective Action Beyond the Facility Boundary

Directs EPA to issue regulations requiring corrective action beyond the facility boundary where necessary to protect human health and the environment, unless the owner/operator can demonstrate that he is unable to obtain the necessary permission, despite his best efforts. Until such regulations are promulgated, corrective action orders can be issued to require the necessary corrective action.

2. Corrective Action Process

Six Phases of the Corrective Action Process

- Screening Phase
- RCRA Facility Assessment (RFA) Phase
- RCRA Facility Investigation (RFI) Phase
- Media Protection Standard (MPS) Phase
- Corrective Measures Study (CMS) Phase
- Corrective Measures Implementation (CMI) Phase

Screening Phase

- identify facilities where corrective action is an option.
- send information request letters to facilities.
- review letter responses.
- rank facilities to set priorities.

RCRA Facility Assessment (RFA) Phase

- identify and gather information on releases/potential releases at RCRA facilities;
- evaluate solid waste management units and units for releases/potential releases to the five media (groundwater, surface water and sediment, soil, air, subsurface gas);
- identify which of the five media have (potentially have been) affected by a release/potential release.
- identify migration pathways for identified releases and potential receptors.
- aid the project manager in making preliminary determinations regarding potential environmental harm and the need for interim measures at a facility.

RCRA Facility Investigation (RFI) Phase

- verify the presence of potential releases from solid waste management units/units that were identified in the RFA.
- characterize the nature, rate, and extent of releases from solid waste management unit (and units) to the soils, groundwater, air, surface water/sediments, and subsurface gases.
- develop information necessary to determine the need for corrective action measures and to aid in the selection and design of these measures.

Media Protection Standard (MPS) Phase

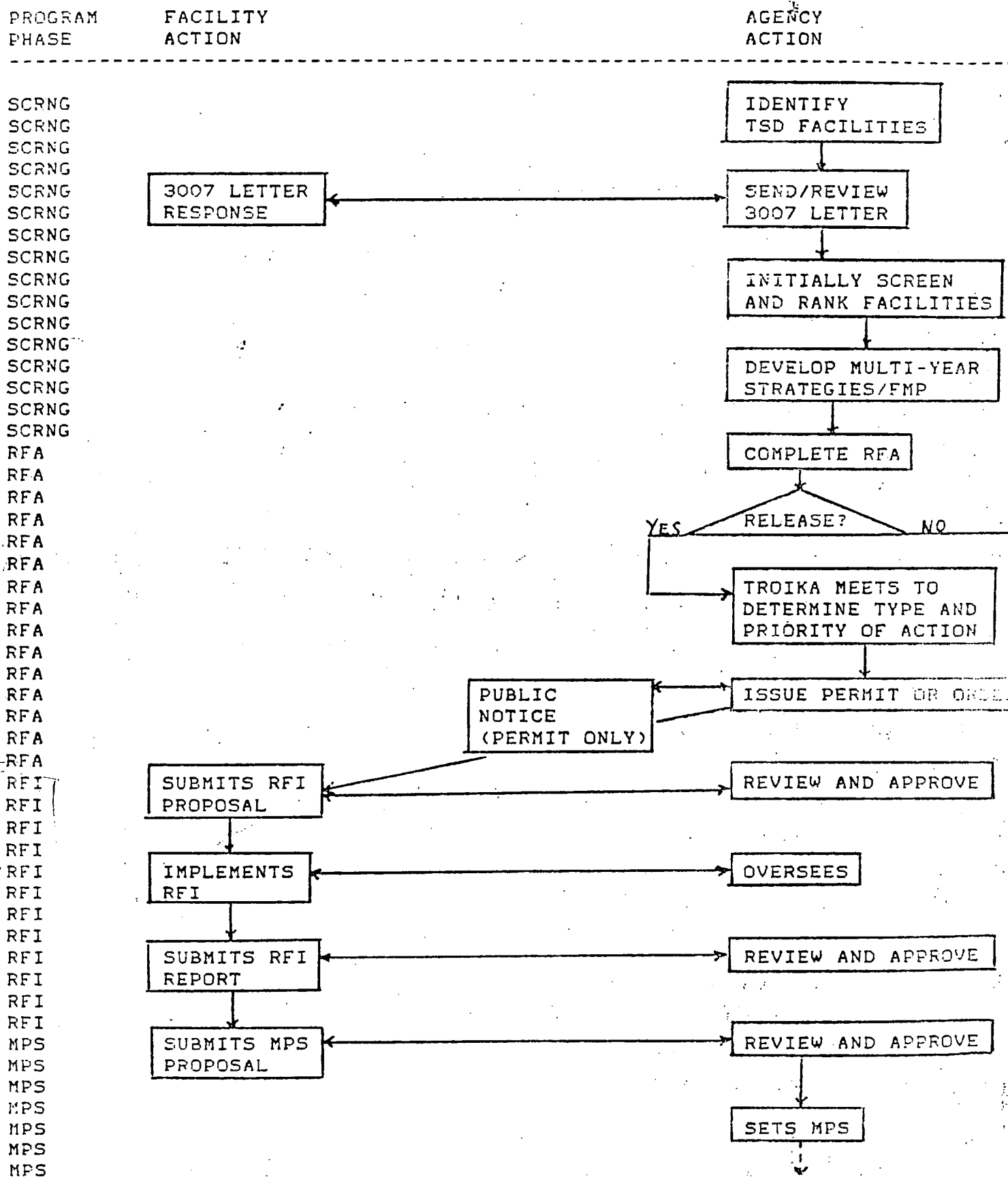
- establish concentration limit for release identified during the RFI to any/all media (groundwater, surface water/sediments, soil, air and subsurface gas). Must be protective of human health and the environment.

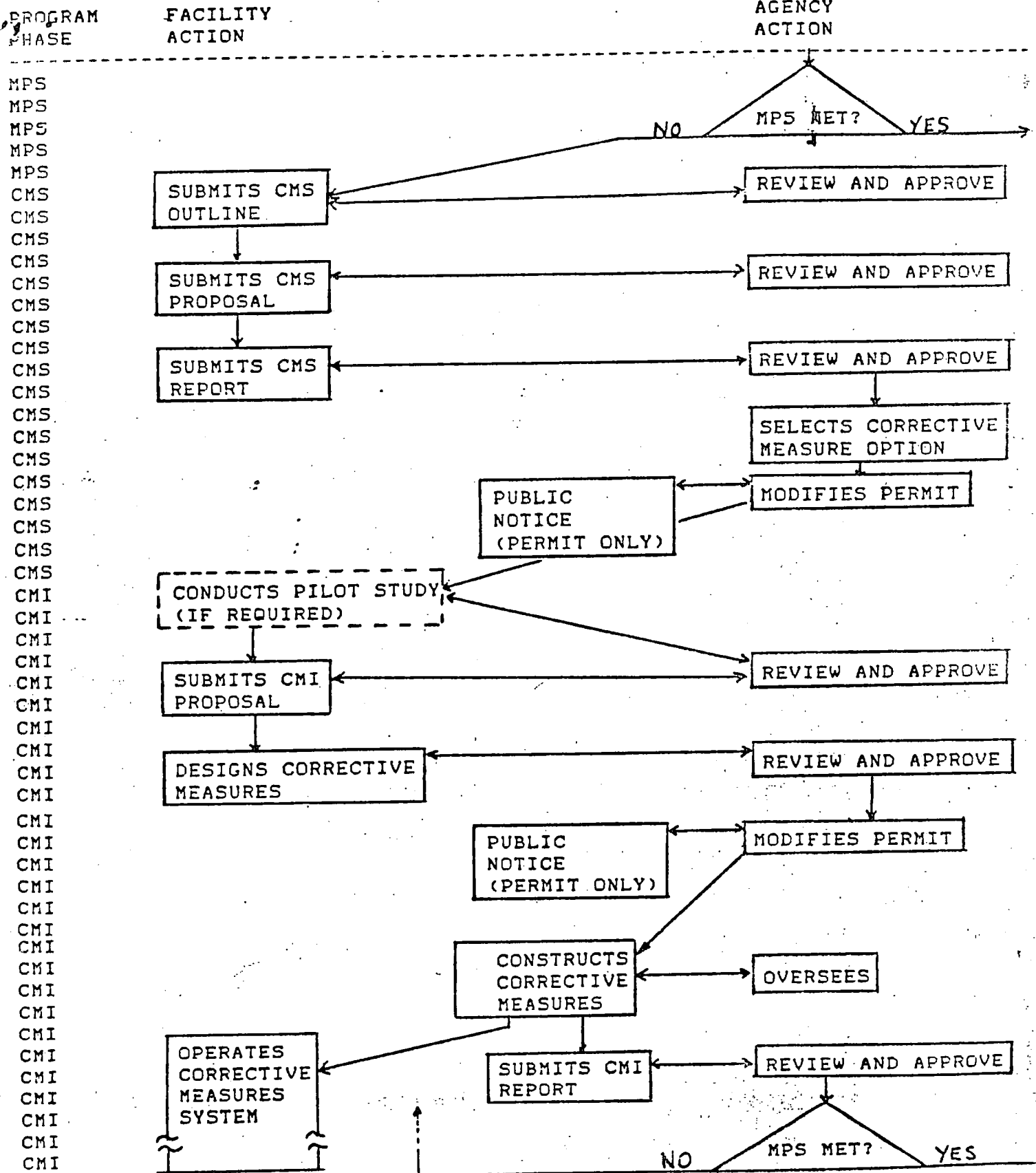
Corrective Measures Study (CMS) Phase

- establish corrective measure objectives. Must meet MPS.
- list, summarize, and screen potential corrective measure alternatives.
- develop in detail the various screened alternatives, providing data for comparative analysis.
- recommend specific corrective measures to be implemented.

Corrective Measures Implementation (CMI) Phase

- design, construction, operation and maintenance of corrective measures.
- verify that corrective action measures will meet MPS.





GLOSSARY OF TERMS

 TERM DEFINITION

TSD - TREATMENT, STORAGE, DISPOSAL FACILITY
 FMP - FACILITY MANAGEMENT PLAN
 RFA - RCRA FACILITY ASSESSMENT
 RFI - RCRA FACILITY INVESTIGATION
 MPS - MEDIA PROTECTION STANDARD
 CMS - CORRECTIVE MEASURES STUDY
 CMI - CORRECTIVE MEASURES IMPLEMENTATION
 CA - CORRECTIVE ACTION
 ORC - OFFICE OF REGIONAL COUNSEL
 TROIKA - SITE MANAGER, SECTION CHIEF, ATTORNEY
 SCRNG - SCREENING PHASE

1
 SUPERFUND EQUIVALENT

PA/SI

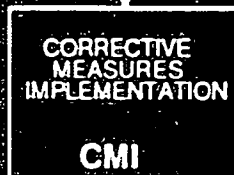
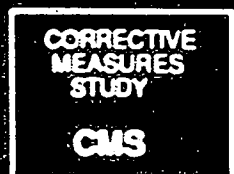
RI

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PUBLIC INVOLVEMENT IN CORRECTIVE ACTION

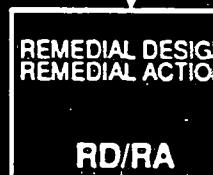
RCRA PERMITTING

- Public Notice
- Public Comment Period
- Public Hearing, if requested
- Notice of Decision
- Response to Comments



RCRA ENFORCEMENT

- Agency Issue Notice/Analysis of Proposed Corrective Measures Plan
- Public Comment Period
- Responsiveness Summary
- Notice Final Plan for Corrective Measure
- Fact Sheets
- Public Meetings



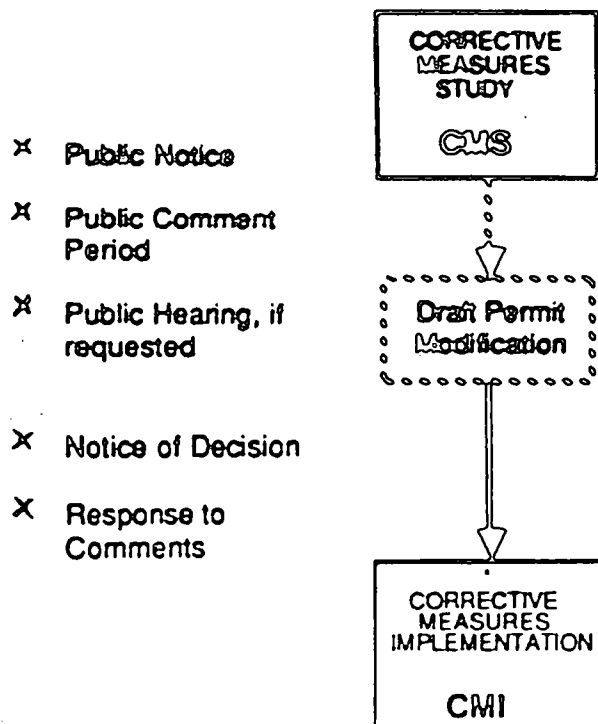
CERCLA

- Public Comment Period
 - On the RI/FS Report
 - On Consent Decrees
- Public Meeting
- Revised Community Relations Plan
 - Fact Sheets
 - Meetings

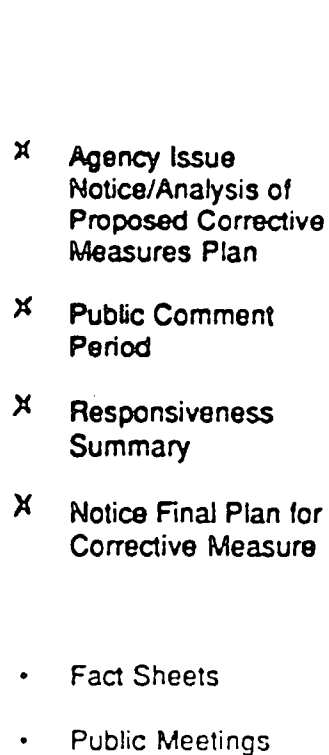
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- Suggested
- Refers to Permits only

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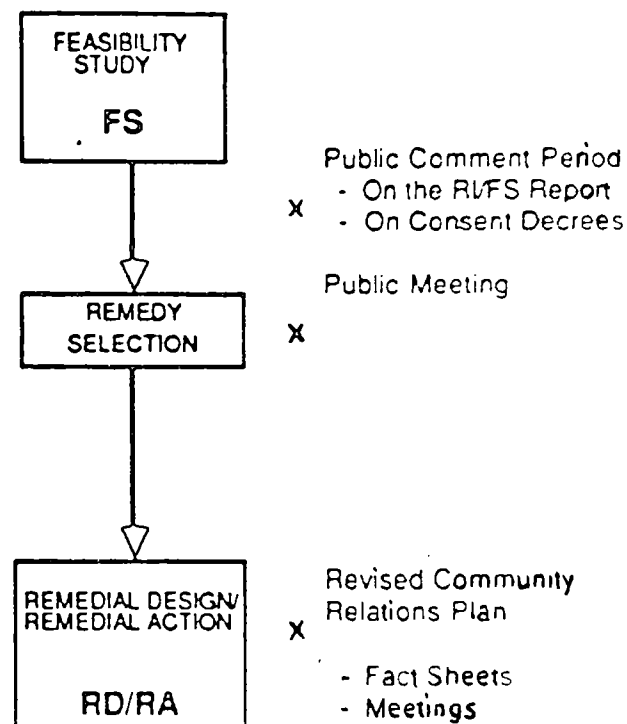
RCRA PERMITTING



RCRA ENFORCEMENT



CERCLA



- ✕ Required
- Suggested
- ... Refers to Permits only

PUBLIC INVOLVEMENT IN RCRA §3008(h)

RCRA FACILITY
ASSESSMENT
RFA

- Conduct Field Assessment
- Public Involvement Plan
- Public Meetings

RCRA FACILITY
INVESTIGATION
RFI

- Fact Sheets
- Public Meetings

CORRECTIVE
MEASURES
STUDY
CMS

- Agency Issue Notice/Analysis of Proposed Corrective Measures Plan
- Public Comment Period
- Responsiveness Summary
- Notice Final Plan for Corrective Measure

CORRECTIVE
MEASURES
IMPLEMENTATION
CMI

- Fact Sheets
- Public Meetings

Required
Suggested

PUBLIC INVOLVEMENT IN RCRA §3008(h)

RCRA FACILITY
ASSESSMENT
RFA

- Conduct Field Assessment
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RCRA FACILITY
INVESTIGATION
RFI

- Fact Sheets
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CORRECTIVE
MEASURES
STUDY
CMS

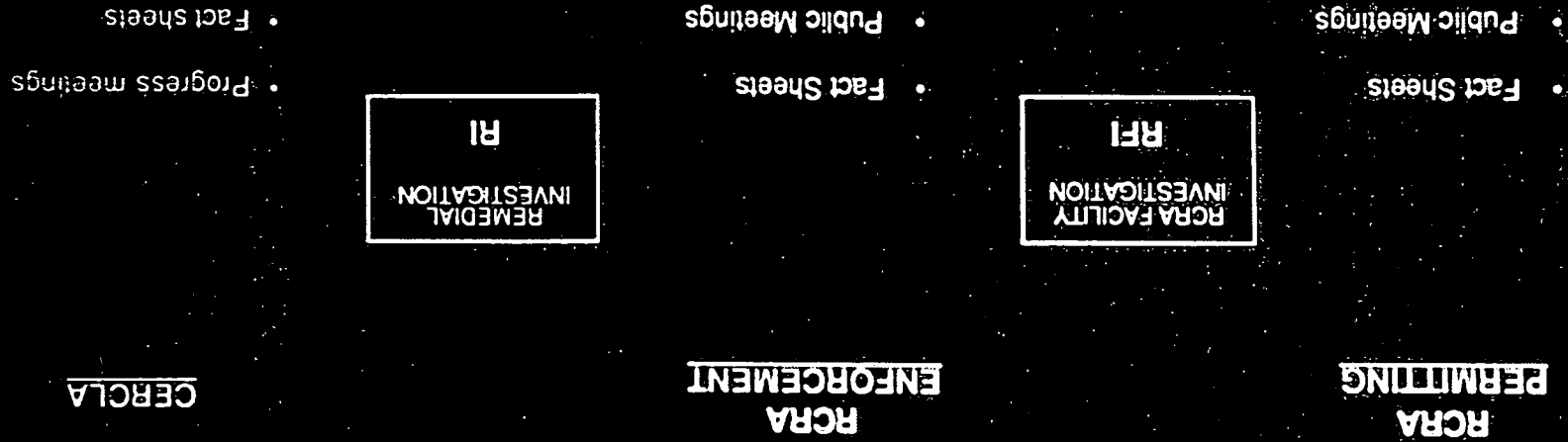
- ✕ Agency Issue Notice/Analysis of Proposed Corrective Measures Plan
- ✕ Public Comment Period
- ✕ Responsiveness Summary
- ✕ Notice Final Plan for Corrective Measure

CORRECTIVE
MEASURES
IMPLEMENTATION
CMI

- Fact Sheets
- Public Meetings

✕ Required
◦ Suggested

PUBLIC INVOLVEMENT IN CORRECTIVE ACTION



• Suggested

PUBLIC INVOLVEMENT IN CORRECTIVE ACTION

RCRA PERMITTING

RCRA FACILITY INVESTIGATION

RFI

- Fact Sheets
- Public Meetings

RCRA ENFORCEMENT

REMEDIAL INVESTIGATION

RI

- Fact Sheets
- Public Meetings

CERCLA

- Progress meetings
- Fact sheets

-
- Suggested

PUBLIC INVOLVEMENT IN CORRECTIVE ACTION

RCRA PERMITTING

- Conduct Field Assessment
- Public Involvement Plan
 - Mailing List
- Public Notice
- Public Comment Period
- Public Hearing, if requested
- Fact Sheet

RCRA FACILITY
ASSESSMENT
RFA

DRAFT PERMIT

RCRA ENFORCEMENT

- Conduct Field Assessment
- Public Involvement Plan
- Public Meetings

PRELIMINARY
ASSESSMENT/
SITE
INVESTIGATION
PA/SI

CERCLA

- Public Comment Period on the Proposed NPL
- Community Interviews
- Community Relations Plan
- Information Repository
- Fact Sheets
- Public Meetings

- Required
- Suggested
- Refers to Permits only

PUBLIC INVOLVEMENT IN CORRECTIVE ACTION

RCRA PERMITTING

- Conduct Field Assessment
- Public Involvement Plan
 - Mailing List
- ✕ Public Notice
- ✕ Public Comment Period
- ✕ Public Hearing, if requested
- Fact Sheet

RCRA FACILITY
ASSESSMENT
RFA



DRAFT PERMIT

RCRA ENFORCEMENT

- Conduct Field Assessment
- Public Involvement Plan
- Public Meetings

PRELIMINARY
ASSESSMENT/
SITE
INVESTIGATION
PA/SI

CERCLA

- ✕ Public Comment Period on the Proposed NPL
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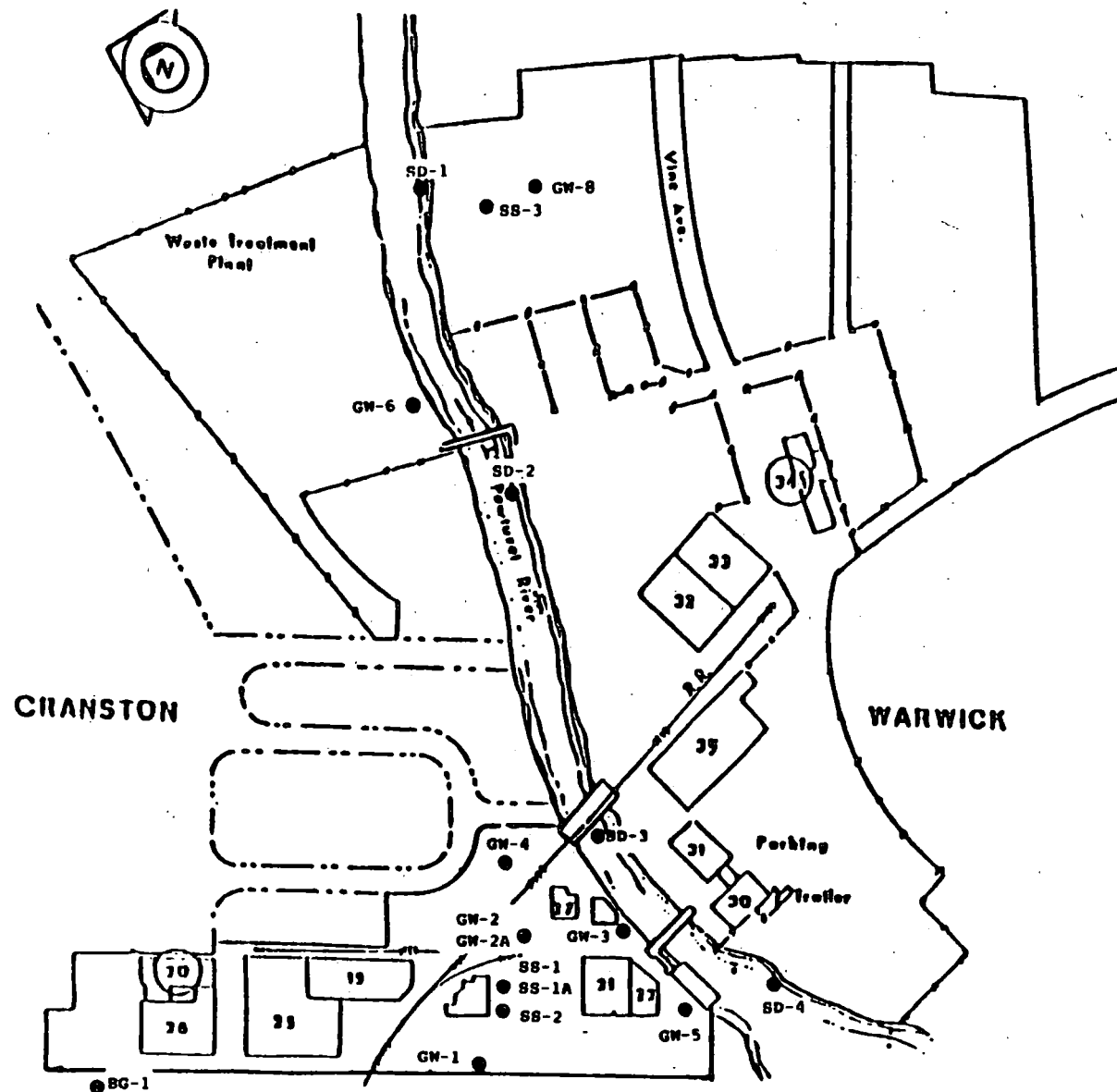


FIGURE 2
 SAMPLING LOCATIONS CIBA-GEIGY CORP.,
 CRANSTON, RHODE ISLAND
 June 11-12, 1987

TABLE A
SAMPLE IDENTIFICATION

Versar Field Sample I.D.	EPA Identification	Analytical Parameters
GW8, ground water	AH 641, MAD 062	VOA, B/N/A, Metals
SS3, surface soil	AH 642, MAD 062	Full HSL
GW6, ground water	AH 643, MAD 063	VOA, B/N/A, Metals
GW4, ground water	AH 644, MAD 064	Full HSL
EB1, equipment blank	AH 645, MAD 065	Full HSL
SD3, sediment	AH 646, MAD 066	Full HSL
GW3, ground water	AH 647, MAD 067	Full HSL
GW5, ground water	AH 648, MAD 068	Full HSL
GW3, ground water	AH 649, MAD 069	Full HSL
SS2, subsurface soil	AH 650	VOA, B/N/A, Pest/PCB
GW2A, ground water	AH 651, MAD 070	Full HSL
GW1, ground water	AH 652, MAD 149	Full HSL
BG1, background surface soil	AH 653, MAD 150	Full HSL
SS1A, subsurface soil	AH 654	VOA, B/N/A, Pest/PCB
SS1, subsurface soil	AH 655	VOA, B/N/A, Pest/PCB
SD4, sediment	AH 656, MAD 153, 3020A-02	Full HSL, TCDD, TCDF
SD2, sediment	AH 657, MAD 151	Full HSL
SD1, sediment	AH 658, MAD 152 3020A-02	Full HSL TCDD, TCDF

TABLE 1
SAMPLE LOCATIONS AND COLLECTION TIMES, CIBA-GEIGY,
CRANSTON, RHODE ISLAND, JUNE 11-12, 1987

Sample Location	Number of Samples	Collection Times (hours)	Date	Sample Matrix
Main Tank Farm:				
SS1, SS2, SS1A	2	1815, 1615 1815	6/11/87	Subsurface soil, grab Subsurface soil, duplicate
Silt Pile:				
SS3	1	0800	6/11/87	Surface soil, composite
Monitoring Pipes:				
GW1, GW2, GW3, GW4	7	1715, 1600, 1330, 1130 1430, 0945, 0845	6/11/87	Groundwater, grab
GW5, GW6, GW8				
GW2A	1	1600	6/11/87	Groundwater, duplicate
EB1	1	1330	6/11/87	Equipment blank
Pawtuxet River:				
SD3	1	1245	6/11/87	Sediment, grab
SD1, SD2, SD4	4	1055, 1130, 1150	6/12/87	Sediment, grab
Background:				
BG1	1	1650	6/11/87	Surface soil, grab